REMARKS

Amendments to the Claims

Claims 1, 14, 22 and 24 are amended. New claims 26 and 27 are added. Upon entry of the present amendments, claims 1-27 are pending.

Claims 1, 14 and 22 are amended to specify that the state or set of information in the list of the list model is associate with the entity. This amendment makes more explicit the difference between a list-based model (of this invention) and the field-based models of the Oracle systems. Support for this amendment is found, *e.g.*, at page 15, line 27, through page 17, line 9, and in FIG. 9B.

Claim 24 is amended to remove a hyphen; the substance of this claim remains unchanged.

Support for new claims 36 and 27 is likewise found, *e.g.*, at page 15, line 27, through page 17, line 9, and in FIG. 9B.

Accordingly, no new matter is added with these amendments.

Each of the grounds for objection and rejection cited in the Office Action is addressed below, under an appropriate sub-heading.

Objection to Claim 24

The Examiner objected to claim 24 based on the indication that the "the list-model" should be referred to as "the list model." Claim 24 is amended accordingly, thereby remedying this objection.

35 U.S.C. §103: Non-obviousness of the Claims

Claims 1, 3-4, 14 and 22-25 were rejected under 35 U.S.C. §103(a), as being obvious in view of Oracle® Applications Concepts, Release 11 for UNIX, 1998 ("OraAPP") and Oracle® Inventory Technical Reference Manual, Release 11i, December 1999 ("OraInv").

Applicants have herein amended each of the independent claims to specify that the state or set of information in the list of the list model is associated with the entity. This

characterization is consistent with the embodiment illustrated in FIG. 9B, wherein the entity model of the left column includes various entities (*e.g.*, Bobby, Trent, Sylvia, *etc.*), and the states (*e.g.*, lead, suspect, prospect, or hot) associated with the entities are included in the list model represented in the right column.

The Oracle systems, in contrast, possess a field-based structure, wherein the association of a new state or set of information with an entity requires the creation of a new field in the entity representation, itself. For example, in OraInv, MTL_MATERIAL_TRANSACTIONS includes 26 "foreign keys," as indicated at page 3-377 to 3-378 of OraInv, that enable the association of states or sets of information with the entity. When an attribute (*e.g.*, a state or set of information) is added in the Oracle system, the data model of the entity must be changed (*e.g.*, by adding a new foreign key or by redefining a foreign key); such an alteration of the data model is akin to redesigning the foundation of a house within the context of the overall model.

Similarly, MTL_TRANSACITON_TYPES, described at page 3-557 to 3-558 of OraInv, include 15 "Flexfield Attributes." The Flexfield Attributes are part of the entity model and serve as "place holders" for future attributes. Though, of course, such a structure is inherently limited to 15 attributes. If more attributes (*e.g.*, states or sets of information) are desired, then the entity model will need to be reengineered. On the other hand, if fewer than 15 attributes are needed, then the data model includes needless overhead and space usage.

In contrast, the systems and methods defined in the amended claims do not require any such "foreign keys" or flexfield attributes" because the states or sets of information and the associations with the entity are all made in the list model (and not in the entity model). Consequently, a limitless freedom is provided for redefining, introducing or removing states or sets of information without having to alter the data model of the entity. Furthermore, segregating these associations into the list model, rather than in the entity model, more readily enables the tracking of changes in the associations with the entities. This segregation also makes the system much more amenable to adaptation, as limitless changes in associations (particularly with new or redefined states or sets of information) can be made without needing to the change the construct of the entity model.

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None of the Oracle documents disclose or suggest the use of a list model wherein a state or set of information is associated with the entity in a list of the list model rather than in a field of the entity model. Accordingly, Applicants respectfully request that this ground for rejection be reconsidered and withdrawn.

<p style="text-align:center">**CONCLUSION**</p>

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

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